

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC 20554

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FEB 28 2005

In the Matter of

Federal Communications Commission
Office of Secretary

Amendment of Section 73.202(b))	
Table of Allotments)	MB Docket No. 02-199
FM Broadcast Stations)	RM - 10514
(Magnolia, Arkansas and Oil City, Louisiana))	

To: Office of the Secretary
 Attn: The Commission

OPPOSITION TO MOTION
FOR LEAVE TO FILE SUPPLEMENT

Cumulus Licensing LLC ("Cumulus"), licensee of Station KVMA-FM,¹ by its counsel, hereby opposes the Motion for Leave to File Supplement to Application for Review filed by Access.1 Louisiana Holding Company, LLC ("Access.1") in the above-captioned proceeding. The Supplement discusses events unrelated to the questions presented in this proceeding. Moreover, the events do not support the conclusion that Access.1 endeavors to draw from them.

1. In this proceeding, Access.1 seeks Commission review of the Media Bureau's decision to grant a change of community of license of Station KVMA-FM from Magnolia, Arkansas to Oil City, Louisiana. *Magnolia, Arkansas and Oil City, Louisiana*, 18 FCC Rcd 8542 (2003), *recon. denied*, 19 FCC Rcd 1553 (2004). The Commission's procedures in such cases derive from Section 307(b) of the Communications Act, which obliges the Commission to achieve a fair and equitable distribution of radio service among the various communities. *See* 47

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¹ Cumulus is the assignee of Columbia Broadcasting Company, Inc., pursuant to the FCC's consent. *See* File No. BALH-20041210AAP.

U.S.C. § 307(b). Therefore, the only matters relevant in this proceeding are those that are directed towards the merits of an allotment in Oil City versus an allotment in Magnolia.

2. After the effective date of the rule changes in this proceeding, Cumulus filed an application to implement the change of community. The application was granted, and Cumulus constructed the facilities and began operation. However, as the Media Bureau is well aware, the operation interfered with certain radio reception equipment operated by the U.S. Air Force at nearby Barksdale Air Force Base. This resulted in an order to Cumulus to cease operations at the new location. In an effort both to test the feasibility of alternative solutions and to resume broadcast operations in some form, Cumulus filed a request for Special Temporary Authority ("STA") to operate on a new frequency at a reduced power. It is this information that Access.1 now seeks to enter into this proceeding.

3. The interference problem that affects Barksdale operations was completely unforeseeable. *See* Declaration of Gary Kline (Exhibit 4 to the attached Letter Response). The problem is that the radio receivers in certain aircraft, while tuned to a center frequency of 108.9 MHz or 109.9 MHz, are unable to reject KVMA-FM's signal at 107.9 MHz, five to 10 channels away. However, the Air Force does not routinely disclose the frequencies on which it conducts its military operations, and even if those frequencies were known, no amount of due diligence would have disclosed that the airborne receivers cannot reject signals as much as 2 MHz lower in the FM band. Indeed, it is likely that the problem would have occurred had KVMA-FM been allotted at an even lower frequency than 107.9 MHz. Moreover, it is conceivable that the problem would have occurred even if KVMA-FM had been located at a tower in Oil City rather than in Shreveport. *See* Statement of Gary M. Allen (Exhibit 3 to the attached Letter Response).

4. With this in mind, Cumulus's STA request is a reasonable reaction to what was basically a bolt from the blue. Having been forced off the air by unforeseeable circumstances, KVMA-FM's expeditious return to the air is in the public interest. Resuming KVMA-FM's broadcast operations expeditiously suggests, in turn, the use of its current tower. In 2003, Cumulus had commissioned an engineering study to test the feasibility of using several alternative sites for the KVMA-FM build-out, but found that none were viable. The current site, with a co-owned tower, was chosen because it offered the best prospects for constructing KVMA-FM, and that analysis remains true today. While Access.1 raises questions about the use of alternative sites for the STA operation, those questions are not pertinent to this proceeding, and are addressed in Cumulus' letter responding to the Commission in connection with the STA request. See Letter Response, attached hereto Exhibit A.

5. Access.1's supplement asks the Commission to revise the Bureau's decision not because of any error, but because of subsequent events stemming from the STA request. Access.1 argues that these events demonstrate an "intent" to serve Shreveport rather than Oil City. This conclusion obviously doesn't follow from the premises, but it is consistent with the steady stream of speculation, innuendo, and unsupported assumptions that Access.1 has been serving up since the initiation of this proceeding. As Cumulus has repeatedly demonstrated, and the Media Bureau has repeatedly agreed, Cumulus's "intent" is irrelevant in this proceeding, in which the goal is to achieve a favorable arrangement of allotments.² Moreover, even if intent

² The Commission long ago decided to stop trying to determine in advance whether a licensee will serve its community of license. See *In the Matter of the Suburban Community Policy, the Berwick Doctrine and the De Facto Reallocation Policy*, 93 F.C.C.2d 436, 445 (1983) ("...we have determined that the policies in question, which attempt to ascertain an applicant's intent with respect to the community to be served, should be abolished....[T]he policies provide incumbent stations a means to delay competition from new suburban stations and thereby retard competition in metropolitan markets."). Access.1's behavior in this proceeding fits the Commission's description perfectly.

were somehow an issue, the "evidence" Access.1 seeks to enter into this proceeding is simply not probative of Cumulus's intent. The Commission should reject it out of hand.

6. As always, it is easy to see why Access.1 has prejudged the issues in this proceeding. Access.1 operates a six-station cluster in the Shreveport market, but only one of those stations, KOKA(AM), is licensed to Shreveport, and only two, KBTT(FM) and KDKS(FM), are licensed to communities in the Shreveport Urbanized Area. The others, KLKL(FM), KSYR(FM), and KTAL-FM, are licensed to the remote communities of Minden, Louisiana, Benton, Louisiana, and Texarkana, Texas, respectively. As the largest Shreveport FM radio group owner, Access.1 commits daily the offense it accuses Cumulus of: abandoning its rural base in favor of the urban center. Indeed, Access.1's Supplement is nothing more than a cheap shot by an urban market leader intent on stifling competition.

WHEREFORE, for the foregoing reasons, the Commission should deny Access.1's Motion for Leave to File Supplement in this proceeding. It should promptly affirm the action of the Media Bureau, which was well-reasoned and consistent with longstanding practice and procedure.

Respectfully submitted,

CUMULUS LICENSING LLC

By: 

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J. Thomas Nolan
Vinson & Elkins, LLP
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Washington, D.C. 20004
(202) 639-6500

Its Counsel

February 28, 2005

EXHIBIT A

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Tel 202.639.6771 Fax 202.879.8971

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February 15, 2005

FEB 15 2005

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Federal Communications Commission
Office of Secretary

Re: **Supplement to Request for Special Temporary Authority, Progress Report and Response to Informal Objection filed by Access.1 Louisiana Holding Company, LLC**
Cumulus Licensing LLC
Station KVMA-FM, Oil City, LA
Facility ID No.: 12414

Dear Ms. Dortch:

Cumulus Licensing LLC ("Cumulus"), licensee of Station KVMA-FM, Oil City, Louisiana, hereby files this Supplement in support of its pending Request for Special Temporary Authority ("STA") to demonstrate that no channels are immediately available to serve Oil City. In addition, this letter will serve as a Progress Report which was requested by the Commission's letter of January 12, 2005. This letter will also serve as a Response to the Informal Objection filed on Feb. 9, 2005 by Access.1 Louisiana Holding Company, LLC ("Access.1").

On January 13, 2005, Cumulus submitted a Request for Special Temporary Authority to operate on Channel 263 at its current authorized site with facilities of 650 Watts at 163 meters above average terrain. This STA was submitted immediately after Cumulus was notified by Commission letter of January 12, 2005 that it must discontinue operations due to interference caused to navigational equipment at Barksdale Air Force Base ("AFB"). After studying all channels at the current site it was determined that this channel was the only one available that would permit KVMA-FM to reinstitute service immediately while Cumulus searched for a permanent solution. To resume service at any other existing tower site would likely take a minimum of six (6) months. If it is necessary to build a new tower it could take considerably longer. However, in view of the fact that this STA proposal would not provide a 70 dBu signal to Oil City, the FCC staff has requested that Cumulus demonstrate that no other channels are available at any location which will provide a 70 dBu signal to Oil City.

Cumulus has since commissioned a search of all 80 non-reserved channels using Oil City's coordinates to determine, initially, if there is any location on any channel that will permit operation

on a temporary basis. The results are contained in the enclosed Preclusion Study and Engineering Statement. See Exhibit 1.

This study shows that existing stations preclude the use of each of the 80 non-reserved channels at any power and height combination except Channel 285A which is currently the subject of a rule making proceeding (MB Docket No. 05-37). The available area for this channel is extremely small and has no towers. The short spaced area was also studied to determine whether an existing tower could be found that would allow a temporary solution. The study determined that there is no tower that would allow the station to cover any part of Oil City with a 70 dBu signal. The best that can be achieved is a 220 watt facility on an existing structure that reaches less than 50% of Oil City with a 60 dBu (rather than a 70 dBu) signal. The availability and structural integrity for another antenna on this tower is not known. Nor is it known how soon the station can operate there if there is a willingness on the tower owner's part to lease space temporarily. Therefore the best that can be hoped for is that sometime in the next 6 months to a year there may be a temporary solution. A permanent solution on the channel will need to await the outcome of the rule making proceeding and perhaps an auction as well.

As discussed in the STA, Cumulus was offering an immediate albeit temporary solution in the hope that service could be restored enabling the station's employees to continue working and to avoid the possibility that the one year clock would start running without a known way of resuming service within the year. The proposed use of Ch. 263 at a much lower power level than permitted for Class A stations is not an adequate facility. But it was the only option to keep the station on the air and the station's staff employed. Clearly this request was not intended as a permanent solution. Nor was it intended as a long term temporary solution.

Cumulus' engineer has worked with an FAA consultant to evaluate the possibility of resuming service on Channel 300 sometime in the future at any site which will serve Oil City. A map of the available site area is enclosed along with the Statement of Gary M. Allen of Aviation Systems, Inc. See Exhibit 2. First, Mr. Allen evaluated two existing towers which have broadcast stations serving the area. Mr. Allen determined that there would be electromagnetic interference ("EMI") to regional navigational systems affecting four (4) localizers. His conclusion is that neither of the two sites are feasible. In addition, an estimate of the structural costs to install another antenna on either tower had previously been obtained (in June 2003) and the result was that the cost would range from \$168,791 to \$252,105 to have the structural work done. See Exhibit 3. This estimate was only one step that Cumulus took in its due diligence efforts prior to selecting the current tower site. When the existing site location was selected there was no possibility that Cumulus could have determined that it would cause actual interference to the antiquated receivers used in the air at the AFB. Cumulus' Chief Engineer describes the unanticipated problems associated with these receivers in use at Barksdale in his enclosed Statement. See Exhibit 4. It would be unreasonable for anyone to assert that actual interference from 107.9 MHz would be caused to the navigational equipment on 108.9 and 109.9 MHz. These interference problems are not EMI in nature. They are what is known as brute force and only occur because the receivers are unable to differentiate between signals as far apart as 107.9 and 108.9 MHz! See enclosed Statement from Gary M. Allen. Exhibit 5.

V&E

Marlene H. Dortch, Esq.

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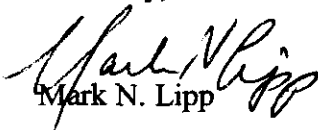
February 15, 2005

Access.1 claims that by providing deficient service to Oil City, the STA request provides additional evidence that Cumulus' intention is to provide service to the Shreveport Urbanized Area. Cumulus' intent is not only irrelevant to the Commission's evaluation of the STA request, the Commission long ago decided to stop trying to determine in advance whether licensees will serve their community of license. See *In the Matter of the Suburban Community Policy, the Berwick Doctrine and the De Facto Reallocation Policy*, 93 FCC 2nd 436, 445 (1983) ("...we have determined that the policies in question, which attempt to ascertain an applicant's intent with respect to the community to be served, should be abolished.... In addition, the policies provide incumbent stations a means to delay competition from new suburban stations and thereby retard competition in metropolitan markets.").

Cumulus has no desire to diminish service to Oil City. Cumulus would much prefer to continue operating with its current facility or on another channel with equivalent facilities. But there is no possibility of doing so within a short time frame. All that the STA represents is an effort to go back on the air immediately and then find a long term solution to the unique and unanticipated problems surrounding the receivers used at Barksdale AFB. Indeed, Access.1's opposition is nothing more than a competitor in the market trying to take advantage of the situation and keep KVMA-FM off the air as long as possible. The public interest is not served by adding roadblocks to the resumption in service by KVMA-FM. Rather Cumulus is making every effort to find another site, to evaluate all other channels, to obtain the most expert advice on the navigational interference considerations, to perform all of the due diligence necessary to insure that the next proposal that is offered will restore service on a long term basis and, in the meantime, to resume operation in the quickest manner despite the reduction in coverage. To impugn Cumulus' motives as nothing more than a plan to serve the Shreveport market at the expense of Oil City is disingenuous at best and completely unwarranted.

Cumulus hereby reaffirms that it will continue to search for a permanent solution to restore service to Oil City. Until then, Cumulus urges the Commission to grant the pending STA request on Ch. 263.

Sincerely,


Mark N. Lipp

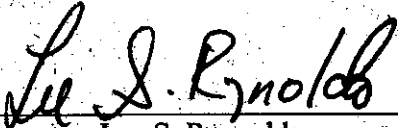
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cc: James L. Winston, Esq. (Counsel for Access.1)

Exhibit 1

**Engineering Statement
Regarding Special Temporary Authority Request
Proposed Use of Channel 285A, Oil City, LA (KVMA)**

We have run preclusion studies for all channels in and around the Oil City, Louisiana area to determine if another channel can be used for KVMA via special temporary authority (STA). The only channel that has a usable window (not subject to substantial overlapping with existing FM stations) is for channel 285A. However, the usable area windows for this channel (both §73.207 and §73.215) contains only three (3) existing towers, all inside the §73.215 window. The best coverage that can be achieved (without overlapping any other stations) is with a facility of 0.22 kW at a HAAT of 50 meters. This facility covers 44.6% of the community of Oil City with a 60 dBu contour.

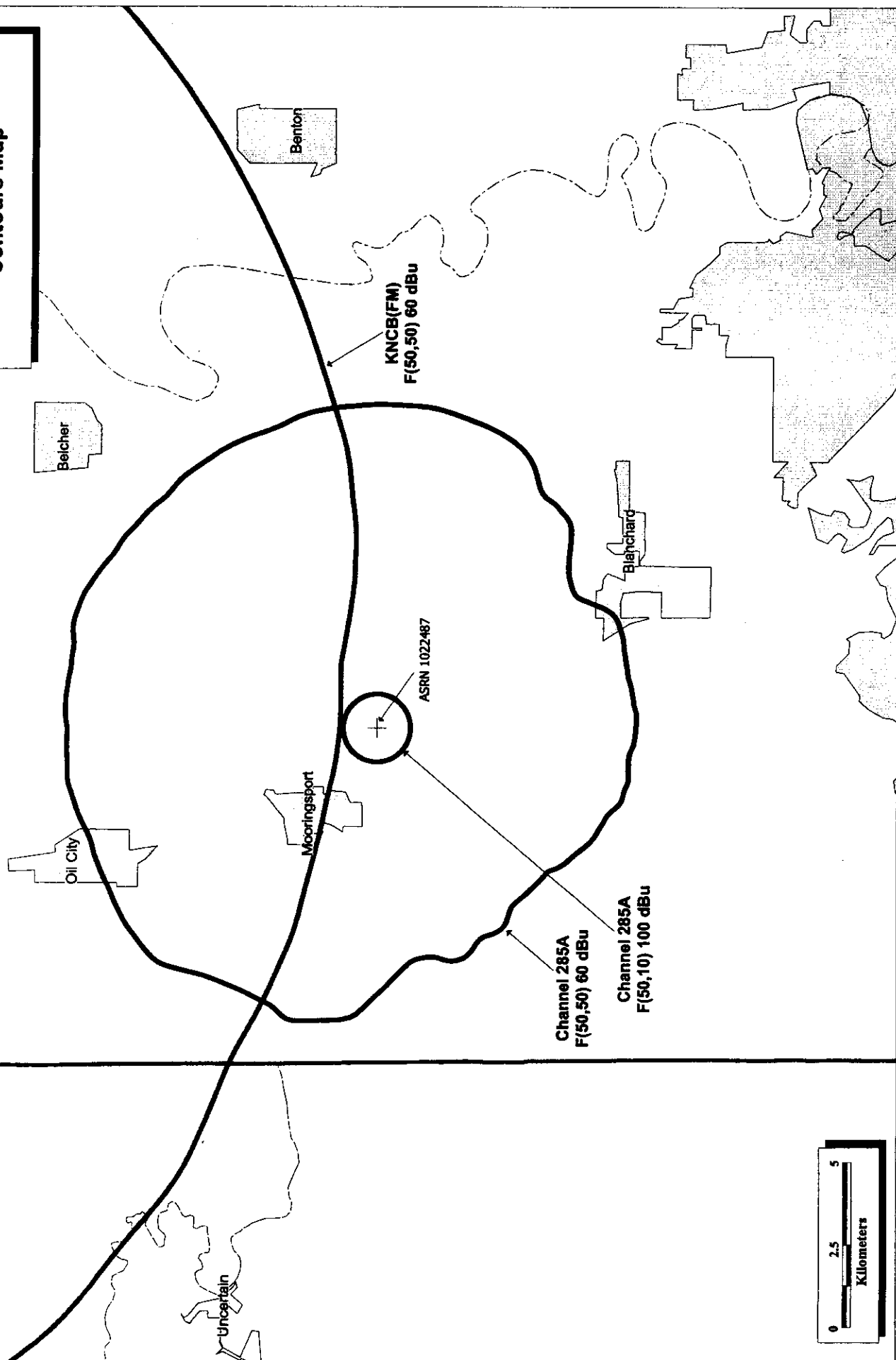


Lee S. Reynolds

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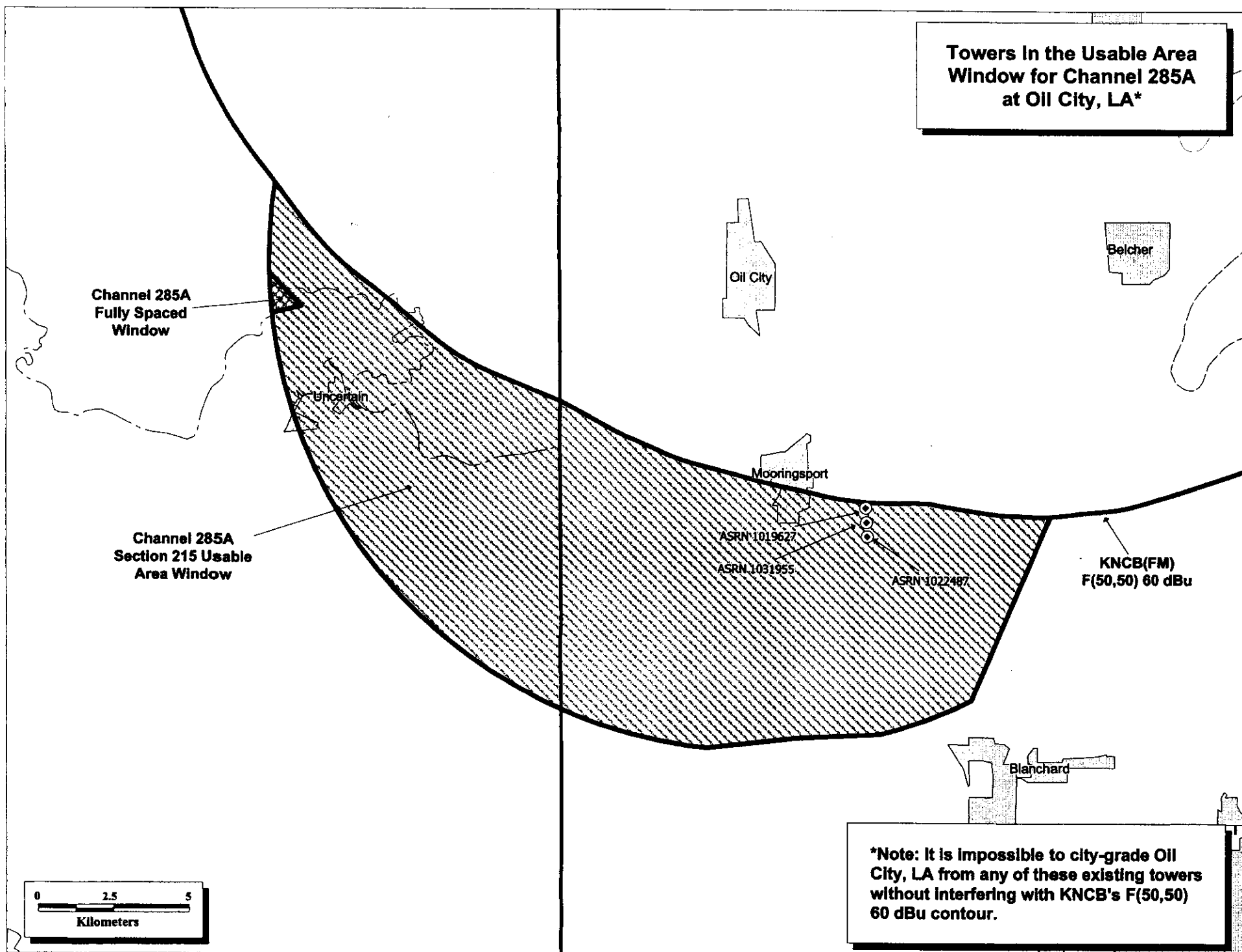
Percentage of Oil City, LA
covered by F(50,50) 60 dBu = 44.6%

Channel 285A, Oil City, LA
KNCB, Vivian, LA
Protected and Interfering
Contours Map



0 2.5 5
Kilometers

**Towers In the Usable Area
Window for Channel 285A
at Oil City, LA***



***Note: It is impossible to city-grade Oil City, LA from any of these existing towers without interfering with KNCB's F(50,50) 60 dBu contour.**

RADDPreclude.txt

Oil City, LA
Preclusion Study

REFERENCE	Class A Preclusions	DISPLAY DATES
32 44 32 N	Current Spacings	DATA 01-25-05
93 58 28 W		SEARCH 02-02-05

--- Channel 221 92.1 MHz. ---

KSYR	LIC	221A	Benton	LA	28.07	110.1	115.0	-86.93
KCULFM	LIC	222A	Marshall	TX	45.84	240.8	72.0	-26.16
KHCJ.C	CP	220A	Jefferson	TX	48.60	282.5	72.0	-23.40
KDOK	LIC-N	221C3	Tyler	TX	128.63	251.8	142.0	-13.37

--- Channel 222 92.3 MHz. ---

KCULFM	LIC	222A	Marshall	TX	45.84	240.8	115.0	-69.16
KSYR	LIC	221A	Benton	LA	28.07	110.1	72.0	-43.93
KHTA	LIC-N	223C3	Wake Village	TX	74.58	0.3	89.0	-14.42

--- Channel 223 92.5 MHz. ---

KHTA	LIC-N	223C3	Wake Village	TX	74.58	0.3	142.0	-67.42
KCULFM	LIC	222A	Marshall	TX	45.84	240.8	72.0	-26.16
KHCL.C	CP -N	223A	Arcadia	LA	97.31	108.8	115.0	-17.69
KSYR	LIC	221A	Benton	LA	28.07	110.1	31.0	-2.93

--- Channel 224 92.7 MHz. ---

KTKC	LIC	225C2	Springhill	LA	55.10	57.4	106.0	-50.90
KJVC	LIC	224A	Mansfield	LA	82.93	164.5	115.0	-32.07
RADD	ADD	224C3	Mount Pleasant	TX	113.89	294.4	142.0	-28.11
RADD	ADD	224C2	Blossom	TX	140.31	304.0	166.0	-25.69
KHTA	LIC-N	223C3	Wake Village	TX	74.58	0.3	89.0	-14.42
RDEL	DEL	224C2	Blossom	TX	158.60	310.9	166.0	-7.40
960703	VAC	224C2	Blossom	TX	158.60	310.9	166.0	-7.40
KSYR	LIC	221A	Benton	LA	28.07	110.1	31.0	-2.93

--- Channel 225 92.9 MHz. ---

KTKC	LIC	225C2	Springhill	LA	55.10	57.4	166.0	-110.90
KTYLFM	LIC-N	226C1	Tyler	TX	106.20	239.9	133.0	-26.80

--- Channel 226 93.1 MHz. ---

KTYLFM	LIC-N	226C1	Tyler	TX	106.20	239.9	200.0	-93.80
KXKSFM	LIC	229C	Shreveport	LA	8.39	148.9	95.0	-86.61
KTKC	LIC	225C2	Springhill	LA	55.10	57.4	106.0	-50.90

Page # 2

Call	Channel	Location	Dist	Azi	FCC	Margin		
KQIDFM	LIC	226C	Alexandria	LA	206.90	125.9	226.0	-19.10
KMJI	LIC-N	227C3	Ashdown	AR	87.51	345.8	89.0	-1.49

--- Channel 227 93.3 MHz. ---

KXKSFM	LIC	229C	Shreveport	LA	8.39	148.9	95.0	-86.61
KMJI	LIC-N	227C3	Ashdown	AR	87.51	345.8	142.0	-54.49

				RADDPreclude.txt				
KTYL FM	LIC-N	226C1	Tyler	TX	106.20	239.9	133.0	-26.80
KAGL	LIC-N	227C3	El Dorado	AR	136.56	64.1	142.0	-5.44

--- Channel 228 93.5 MHz. ---

KXKS FM	LIC	229C	Shreveport	LA	8.39	148.9	165.0	-156.61
KMJI	LIC-N	227C3	Ashdown	AR	87.51	345.8	89.0	-1.49

--- Channel 229 93.7 MHz. ---

KXKS FM	LIC	229C	Shreveport	LA	8.39	148.9	226.0	-217.61
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--- Channel 230 93.9 MHz. ---

KXKS FM	LIC	229C	Shreveport	LA	8.39	148.9	165.0	-156.61
KRUF	LIC	233C	Shreveport	LA	8.87	154.2	95.0	-86.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3	95.0	-85.67

--- Channel 231 94.1 MHz. ---

KXKS FM	LIC	229C	Shreveport	LA	8.39	148.9	95.0	-86.61
KRUF	LIC	233C	Shreveport	LA	8.87	154.2	95.0	-86.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3	95.0	-85.67
AL231	VAC	231C2	Hodge	LA	114.65	125.6	166.0	-51.35
RADD	ADD	231C2	Hodge	LA	121.82	122.5	166.0	-44.18
AL231	VAC	231A	Hooks	TX	88.84	336.4	115.0	-26.16
RADD	ADD	231A	Mount Enterprise	TX	105.92	218.5	115.0	-9.08

--- Channel 232 94.3 MHz. ---

KRUF	LIC	233C	Shreveport	LA	8.87	154.2	165.0	-156.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3	165.0	-155.67
KXKS FM	LIC	229C	Shreveport	LA	8.39	148.9	95.0	-86.61

--- Channel 233 94.5 MHz. ---

KRUF	LIC	233C	Shreveport	LA	8.87	154.2	226.0	-217.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3	226.0	-216.67

--- Channel 234 94.7 MHz. ---

KRUF	LIC	233C	Shreveport	LA	8.87	154.2	165.0	-156.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3	165.0	-155.67

--- Channel 235 94.9 MHz. ---

KRUF	LIC	233C	Shreveport	LA	8.87	154.2	95.0	-86.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3	95.0	-85.67
KSBH.C	CP	235C2	Coushatta	LA	118.27	151.3	166.0	-47.73

Page # 3

Call	channel	Location		Dist	Azi	FCC	Margin	
KSBH	LIC	235C3	Coushatta	LA	121.15	143.8	142.0	-20.85
KEWL FM	CP -N	236C2	New Boston	TX	94.46	334.8	106.0	-11.54
KEWL FM	LIC-N	236C3	New Boston	TX	87.60	331.9	89.0	-1.40

--- Channel 236 95.1 MHz. ---

KRUF	LIC	233C	Shreveport	LA	8.87	154.2	95.0	-86.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3	95.0	-85.67

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KEWLFM	CP -N 236C2	New Boston	TX	94.46	334.8	166.0	-71.54
KEWLFM	LIC-N 236C3	New Boston	TX	87.60	331.9	142.0	-54.40
KLKL	LIC-Z 239C2	Minden	LA	46.63	116.5	55.0	-8.37
KFROFM	LIC-Z 237C3	Gilmer	TX	87.27	262.1	89.0	-1.73

--- Channel 237 95.3 MHz. ---

KCXY	LIC 237C1	East Camden	AR	137.60	51.7	200.0	-62.40
KFROFM	LIC-Z 237C3	Gilmer	TX	87.27	262.1	142.0	-54.73
KEWLFM	CP -N 236C2	New Boston	TX	94.46	334.8	106.0	-11.54
KLKL	LIC-Z 239C2	Minden	LA	46.63	116.5	55.0	-8.37
KEWLFM	LIC-N 236C3	New Boston	TX	87.60	331.9	89.0	-1.40

--- Channel 238 95.5 MHz. ---

KLKL	LIC-Z 239C2	Minden	LA	46.63	116.5	106.0	-59.37
KAFXFM	LIC 238C1	Diboll	TX	165.72	206.9	200.0	-34.28
KFROFM	LIC-Z 237C3	Gilmer	TX	87.27	262.1	89.0	-1.73

--- Channel 239 95.7 MHz. ---

KLKL	LIC-Z 239C2	Minden	LA	46.63	116.5	166.0	-119.37
KPWW	LIC-N 240C3	Hooks	TX	81.62	346.3	89.0	-7.38

--- Channel 240 95.9 MHz. ---

KPWW	LIC-N 240C3	Hooks	TX	81.62	346.3	142.0	-60.38
KLKL	LIC-Z 239C2	Minden	LA	46.63	116.5	106.0	-59.37
KVKIFM	LIC 243C1	Shreveport	LA	19.60	147.2	75.0	-55.40
KKTXFM	LIC-N 241C2	Kilgore	TX	99.52	245.7	106.0	-6.48

--- Channel 241 96.1 MHz. ---

KKTXFM	LIC-N 241C2	Kilgore	TX	99.52	245.7	166.0	-66.48
KMRX	LIC 241C1	El Dorado	AR	136.56	64.1	200.0	-63.44
KVKIFM	LIC 243C1	Shreveport	LA	19.60	147.2	75.0	-55.40
KLKL	LIC-Z 239C2	Minden	LA	46.63	116.5	55.0	-8.37
KPWW	LIC-N 240C3	Hooks	TX	81.62	346.3	89.0	-7.38

--- Channel 242 96.3 MHz. ---

KVKIFM	LIC 243C1	Shreveport	LA	19.60	147.2	133.0	-113.40
KLKL	LIC-Z 239C2	Minden	LA	46.63	116.5	55.0	-8.37
KKTXFM	LIC-N 241C2	Kilgore	TX	99.52	245.7	106.0	-6.48

--- Channel 243 96.5 MHz. ---

KVKIFM	LIC 243C1	Shreveport	LA	19.60	147.2	200.0	-180.40
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Page # 4

Call	Channel	Location	Dist	Azi	FCC	Margin
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--- Channel 244 96.7 MHz. ---

KVKIFM	LIC 243C1	Shreveport	LA	19.60	147.2	133.0	-113.40
KOYE	LIC-N 244C2	Frankston	TX	156.01	240.3	166.0	-9.99

--- Channel 245 96.9 MHz. ---

KVKIFM	LIC 243C1	Shreveport	LA	19.60	147.2	75.0	-55.40
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KSCN	LIC-N	245C3	Pittsburg	RADDPrec	TX	106.75	286.4	142.0	-35.25
KSCN.C	CP	245A	Pittsburg	clude.txt	TX	106.75	286.4	115.0	-8.25

--- Channel 246 97.1 MHz. ---

KVKIFM	LIC	243C1	Shreveport	LA	19.60	147.2	75.0	-55.40
RDEL	DEL	247C2	Longview	TX	76.45	248.8	106.0	-29.55
RDEL	DEL	247C2	Longview	TX	76.45	248.8	106.0	-29.55
880812	VAC	247C2	Longview	TX	76.45	248.8	106.0	-29.55
KAMDFM	LIC	246C2	Camden	AR	137.60	51.7	166.0	-28.40
RADD	ADD	247C2	Longview	TX	81.77	248.0	106.0	-24.23
RADD	ADD	247C2	Longview	TX	100.70	250.0	106.0	-5.30

--- Channel 247 97.3 MHz. ---

880812	VAC	247C2	Longview	TX	76.45	248.8	166.0	-89.55
RDEL	DEL	247C2	Longview	TX	76.45	248.8	166.0	-89.55
RDEL	DEL	247C2	Longview	TX	76.45	248.8	166.0	-89.55
RADD	ADD	247C2	Longview	TX	81.77	248.0	166.0	-84.23
RADD	ADD	247C2	Longview	TX	100.70	250.0	166.0	-65.30
KDBHFM	LIC	247C3	Natchitoches	LA	137.20	139.1	142.0	-4.80

--- Channel 248 97.5 MHz. ---

KTALFM	LIC	251C	Texarkana	TX	18.08	350.6	95.0	-76.92
RADD	ADD	248A	Logansport	LA	84.08	181.2	115.0	-30.92
RDEL	DEL	247C2	Longview	TX	76.45	248.8	106.0	-29.55
880812	VAC	247C2	Longview	TX	76.45	248.8	106.0	-29.55
RDEL	DEL	247C2	Longview	TX	76.45	248.8	106.0	-29.55
RADD	ADD	247C2	Longview	TX	81.77	248.0	106.0	-24.23
RADD	ADD	247C2	Longview	TX	100.70	250.0	106.0	-5.30
RADD	ADD	248A	Center	TX	114.49	185.3	115.0	-0.51
RADD	ADD	248A	Center	TX	114.51	185.3	115.0	-0.49

--- Channel 249 97.7 MHz. ---

KTALFM	LIC	251C	Texarkana	TX	18.08	350.6	95.0	-76.92
KPCH.C	CP	249C2	Dubach	LA	126.06	93.3	166.0	-39.94
KPCH	LIC	249C2	Dubach	LA	126.28	93.4	166.0	-39.72
KALK	LIC-N	249C3	winfield	TX	125.37	293.4	142.0	-16.63

--- Channel 250 97.9 MHz. ---

KTALFM	LIC	251C	Texarkana	TX	18.08	350.6	165.0	-146.92
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--- Channel 251 98.1 MHz. ---

KTALFM	LIC	251C	Texarkana	TX	18.08	350.6	226.0	-207.92
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Call	Channel	Location	Dist	Azi	FCC	Margin
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--- Channel 252 98.3 MHz. ---

KTALFM	LIC	251C	Texarkana	TX	18.08	350.6	165.0	-146.92
KTUX	LIC	255C1	Carthage	TX	39.44	186.1	75.0	-35.56
AL253	VAC	253C3	Ringgold	LA	85.18	122.4	89.0	-3.82

--- Channel 253 98.5 MHz. ---

RADDPreclude.txt

KTALFM	LIC	251C	Texarkana	TX	18.08	350.6	95.0	-76.92
AL253	VAC	253C3	Ringgold	LA	85.18	122.4	142.0	-56.82
KTUX	LIC	255C1	Carthage	TX	39.44	186.1	75.0	-35.56
KGAP	LIC-N	253C2	Clarksville	TX	137.08	315.2	166.0	-28.92
KTALTV	LI	06Z2C	Texarkana	TX	18.12	350.5	22.0	-3.88

--- Channel 254 98.7 MHz. ---

KTUX	LIC	255C1	Carthage	TX	39.44	186.1	133.0	-93.56
KTALFM	LIC	251C	Texarkana	TX	18.08	350.6	95.0	-76.92
KLBQ	LIC	254C3	El Dorado	AR	130.92	66.3	142.0	-11.08
AL253	VAC	253C3	Ringgold	LA	85.18	122.4	89.0	-3.82

--- Channel 255 98.9 MHz. ---

KTUX	LIC	255C1	Carthage	TX	39.44	186.1	200.0	-160.56
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--- Channel 256 99.1 MHz. ---

KTUX	LIC	255C1	Carthage	TX	39.44	186.1	133.0	-93.56
KMJJFM	LIC	259C2	Shreveport	LA	24.06	128.5	55.0	-30.94
KMJJFM	CP -N	259C2	Shreveport	LA	33.87	144.7	55.0	-21.13
AL257	RSV	257C2	White Oak	TX	85.67	252.6	106.0	-20.33
KWDO	LIC	256A	Waldo	AR	102.96	44.1	115.0	-12.04
KLBL	LIC-N	257C2	White Oak	TX	95.99	260.0	106.0	-10.01

--- Channel 257 99.3 MHz. ---

AL257	RSV	257C2	White Oak	TX	85.67	252.6	166.0	-80.33
KLBL	LIC-N	257C2	White Oak	TX	95.99	260.0	166.0	-70.01
RADD	ADD	257C2	Ruston	LA	125.17	103.1	166.0	-40.83
KTUX	LIC	255C1	Carthage	TX	39.44	186.1	75.0	-35.56
KMJJFM	LIC	259C2	Shreveport	LA	24.06	128.5	55.0	-30.94
KMJJFM	CP -N	259C2	Shreveport	LA	33.87	144.7	55.0	-21.13
RDEL	DEL	257C3	Ruston	LA	125.17	103.1	142.0	-16.83
KNBB	LIC-N	257C3	Ruston	LA	125.25	103.1	142.0	-16.75

--- Channel 258 99.5 MHz. ---

KMJJFM	LIC	259C2	Shreveport	LA	24.06	128.5	106.0	-81.94
KMJJFM	CP -N	259C2	Shreveport	LA	33.87	144.7	106.0	-72.13
KTUX	LIC	255C1	Carthage	TX	39.44	186.1	75.0	-35.56
AL257	RSV	257C2	White Oak	TX	85.67	252.6	106.0	-20.33
KLBL	LIC-N	257C2	White Oak	TX	95.99	260.0	106.0	-10.01

--- Channel 259 99.7 MHz. ---

KMJJFM	LIC	259C2	Shreveport	LA	24.06	128.5	166.0	-141.94
KMJJFM	CP -N	259C2	Shreveport	LA	33.87	144.7	166.0	-132.13

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Call	Channel	Location	Dist	Azi	FCC	Margin		
961112	APP	206A	Blanchard	LA	8.39	148.9	10.0	-1.61

--- Channel 260 99.9 MHz. ---

KMJJFM	LIC	259C2	Shreveport	LA	24.06	128.5	106.0	-81.94
KMJJFM	CP -N	259C2	Shreveport	LA	33.87	144.7	106.0	-72.13
KNRB	LIC	261C2	Atlanta	TX	57.85	349.5	106.0	-48.15
961112	APP	206A	Blanchard	LA	8.39	148.9	10.0	-1.61

RADDPreclude.txt

--- Channel 261 100.1 MHz. ---

KNRB	LIC	261C2	Atlanta	TX	57.85	349.5	166.0	-108.15
KMJJFM	LIC	259C2	Shreveport	LA	24.06	128.5	55.0	-30.94
KMJJFM	CP -N	259C2	Shreveport	LA	33.87	144.7	55.0	-21.13
KXALFM	LIC	262A	Tatum	TX	69.19	234.2	72.0	-2.81
KUEZ	LIC	261C2	Lufkin	TX	165.72	206.9	166.0	-0.28

--- Channel 262 100.3 MHz. ---

KNRB	LIC	261C2	Atlanta	TX	57.85	349.5	106.0	-48.15
KXALFM	LIC	262A	Tatum	TX	69.19	234.2	115.0	-45.81
KMJJFM	LIC	259C2	Shreveport	LA	24.06	128.5	55.0	-30.94
KMJJFM	CP -N	259C2	Shreveport	LA	33.87	144.7	55.0	-21.13
KZHE	LIC	263C2	Stamps	AR	104.45	38.5	106.0	-1.55

--- Channel 263 100.5 MHz. ---

KRMDFM	LIC	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KRMDFM	APP-N	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KRMDFM	CP -N	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KZHE	LIC	263C2	Stamps	AR	104.45	38.5	166.0	-61.55
KDAQ	LIC	210C1	Shreveport	LA	8.42	147.8	22.0	-13.58
KXALFM	LIC	262A	Tatum	TX	69.19	234.2	72.0	-2.81

--- Channel 264 100.7 MHz. ---

KRMDFM	APP-N	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KRMDFM	CP -N	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KRMDFM	LIC	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KPXI	LIC-Z	264C3	Overton	TX	121.07	237.4	142.0	-20.93
KDAQ	LIC	210C1	Shreveport	LA	8.42	147.8	22.0	-13.58
KZBL	LIC-N	264C3	Natchitoches	LA	137.20	139.1	142.0	-4.80
KZHE	LIC	263C2	Stamps	AR	104.45	38.5	106.0	-1.55

--- Channel 265 100.9 MHz. ---

KRMDFM	CP -N	266C	Shreveport	LA	7.37	148.6	165.0	-157.63
KRMDFM	LIC	266C	Shreveport	LA	7.37	148.6	165.0	-157.63
KRMDFM	APP-N	266C	Shreveport	LA	7.37	148.6	165.0	-157.63

--- Channel 266 101.1 MHz. ---

KRMDFM	APP-N	266C	Shreveport	LA	7.37	148.6	226.0	-218.63
KRMDFM	CP -N	266C	Shreveport	LA	7.37	148.6	226.0	-218.63
KRMDFM	LIC	266C	Shreveport	LA	7.37	148.6	226.0	-218.63

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Call	Channel	Location	Dist	Azi	FCC	Margin
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--- Channel 267 101.3 MHz. ---

KRMDFM	CP -N	266C	Shreveport	LA	7.37	148.6	165.0	-157.63
KRMDFM	LIC	266C	Shreveport	LA	7.37	148.6	165.0	-157.63
KRMDFM	APP-N	266C	Shreveport	LA	7.37	148.6	165.0	-157.63
KNUE	LIC	268C	Tyler	TX	106.20	239.9	165.0	-58.80
RDEL	DEL	268C	Tyler	TX	106.20	239.9	165.0	-58.80
RADD	ADD	268C0	Tyler	TX	106.20	239.9	152.0	-45.80

--- Channel 268 101.5 MHz. ---

KNUE	LIC	268C	Tyler	TX	106.20	239.9	226.0	-119.80
RDEL	DEL	268C	Tyler	TX	106.20	239.9	226.0	-119.80
RADD	ADD	268C0	Tyler	TX	106.20	239.9	215.0	-108.80
KRMDFM	CP -N	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KRMDFM	LIC	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KRMDFM	APP-N	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KDKSFM	LIC	271C3	Blanchard	LA	17.32	156.4	42.0	-24.68
KBYB	LIC	269C2	Hope	AR	104.83	7.4	106.0	-1.17

--- Channel 269 101.7 MHz. ---

KRMDFM	LIC	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KRMDFM	APP-N	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KRMDFM	CP -N	266C	Shreveport	LA	7.37	148.6	95.0	-87.63
KBYB	LIC	269C2	Hope	AR	104.83	7.4	166.0	-61.17
KNUE	LIC	268C	Tyler	TX	106.20	239.9	165.0	-58.80
RDEL	DEL	268C	Tyler	TX	106.20	239.9	165.0	-58.80
RADD	ADD	268C0	Tyler	TX	106.20	239.9	152.0	-45.80
KDKSFM	LIC	271C3	Blanchard	LA	17.32	156.4	42.0	-24.68

--- Channel 270 101.9 MHz. ---

KDKSFM	LIC	271C3	Blanchard	LA	17.32	156.4	89.0	-71.68
KNOEFM	LIC	270C	Monroe	LA	188.91	108.2	226.0	-37.09
KBYB	LIC	269C2	Hope	AR	104.83	7.4	106.0	-1.17
KYBI	LIC-N	270C2	Huntington	TX	164.95	202.7	166.0	-1.05

--- Channel 271 102.1 MHz. ---

KDKSFM	LIC	271C3	Blanchard	LA	17.32	156.4	142.0	-124.68
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--- Channel 272 102.3 MHz. ---

KDKSFM	LIC	271C3	Blanchard	LA	17.32	156.4	89.0	-71.68
KKYRFM	LIC	273C1	Texarkana	TX	76.98	352.3	133.0	-56.02
KBED	LIC	275C2	Shreveport	LA	33.87	144.7	55.0	-21.13
VA272	VAC	272A	Homer	LA	96.74	91.8	115.0	-18.26
KLJT	LIC	272C2	Jacksonville	TX	148.08	229.5	166.0	-17.92

--- Channel 273 102.5 MHz. ---

KKYRFM	LIC	273C1	Texarkana	TX	76.98	352.3	200.0	-123.02
KDKSFM	LIC	271C3	Blanchard	LA	17.32	156.4	42.0	-24.68
KBED	LIC	275C2	Shreveport	LA	33.87	144.7	55.0	-21.13

--- Channel 274 102.7 MHz. ---

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Call	Channel	Location	Dist	Azi	FCC	Margin		
KBED	LIC	275C2	Shreveport	LA	33.87	144.7	106.0	-72.13
KKYRFM	LIC	273C1	Texarkana	TX	76.98	352.3	133.0	-56.02
KBLZ	LIC	274C3	Winona	TX	113.90	249.9	142.0	-28.10
KBLZ.C	CP	274C3	Winona	TX	113.90	249.9	142.0	-28.10
KDKSFM	LIC	271C3	Blanchard	LA	17.32	156.4	42.0	-24.68

--- Channel 275 102.9 MHz. ---

KBED	LIC	275C2	Shreveport	RADDPreclude.txt	LA	33.87	144.7	166.0	-132.13
KDVE	LIC-N	276C2	Pittsburg		TX	94.52	279.7	106.0	-11.48

--- Channel 276 103.1 MHz. ---

KBED	LIC	275C2	Shreveport	LA	33.87	144.7	106.0	-72.13
KDVE	LIC-N	276C2	Pittsburg	TX	94.52	279.7	166.0	-71.48
KIXB	LIC-N	277C1	El Dorado	AR	111.65	61.1	133.0	-21.35

--- Channel 277 103.3 MHz. ---

KIXB	LIC-N	277C1	El Dorado	AR	111.65	61.1	200.0	-88.35
KBED	LIC	275C2	Shreveport	LA	33.87	144.7	55.0	-21.13
KDVE	LIC-N	276C2	Pittsburg	TX	94.52	279.7	106.0	-11.48
KZRB	LIC	278C2	New Boston	TX	96.87	320.7	106.0	-9.13
AL277	RSV	277C2	Nacogdoches	TX	165.55	208.8	166.0	-0.45
KJCS	LIC	277C2	Nacogdoches	TX	165.55	208.8	166.0	-0.45

--- Channel 278 103.5 MHz. ---

KZRB	LIC	278C2	New Boston	TX	96.87	320.7	166.0	-69.13
KBTT	LIC	279A	Haughton	LA	42.36	119.7	72.0	-29.64
KIXB	LIC-N	277C1	El Dorado	AR	111.65	61.1	133.0	-21.35
KBED	LIC	275C2	Shreveport	LA	33.87	144.7	55.0	-21.13

--- Channel 279 103.7 MHz. ---

KBTT	LIC	279A	Haughton	LA	42.36	119.7	115.0	-72.64
KMHTFM	LIC	280A	Marshall	TX	40.50	240.8	72.0	-31.50
KZRB	LIC	278C2	New Boston	TX	96.87	320.7	106.0	-9.13

--- Channel 280 103.9 MHz. ---

KMHTFM	LIC	280A	Marshall	TX	40.50	240.8	115.0	-74.50
KBTT	LIC	279A	Haughton	LA	42.36	119.7	72.0	-29.64
KPGG	LIC	280A	Ashdown	AR	95.80	354.3	115.0	-19.20
KJLOFM	CP -N	281C	Monroe	LA	164.40	87.7	165.0	-0.60

--- Channel 281 104.1 MHz. ---

KJLOFM	CP -N	281C	Monroe	LA	164.40	87.7	226.0	-61.60
KJLOFM	LIC	281C	Monroe	LA	177.17	92.5	226.0	-48.83
KMHTFM	LIC	280A	Marshall	TX	40.50	240.8	72.0	-31.50
KKUS	LIC	281C2	Tyler	TX	144.13	259.4	166.0	-21.87
KLMZ	LIC	282A	Fouke	AR	68.64	10.1	72.0	-3.36

--- Channel 282 104.3 MHz. ---

KLMZ	LIC	282A	Fouke	AR	68.64	10.1	115.0	-46.36
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Call	Channel	Location		Dist	Azi	FCC	Margin	
KGASFM	LIC	282A	Carthage	TX	78.98	212.6	115.0	-36.02
KJTX	LIC	283A	Jefferson	TX	47.79	281.0	72.0	-24.21
KXKSFM	LIC	229C	Shreveport	LA	8.39	148.9	29.0	-20.61
RADD	ADD	285A	Oil City	LA	15.17	267.6	31.0	-15.83
KJLOFM	CP -N	281C	Monroe	LA	164.40	87.7	165.0	-0.60

--- Channel 283 104.5 MHz. ---

RADDPreclude.txt

Call	LIC	Channel	Location	Dist	Azi	FCC	Margin
KJTX	LIC	283A	Jefferson	TX	47.79	281.0	115.0 -67.21
KBEF	LIC	283A	Gibbsland	LA	76.93	107.4	115.0 -38.07
KXKSFM	LIC	229C	Shreveport	LA	8.39	148.9	29.0 -20.61
RADD	ADD	285A	Oil City	LA	15.17	267.6	31.0 -15.83
KLMZ	LIC	282A	Fouke	AR	68.64	10.1	72.0 -3.36
KORI	LIC	284C3	Mansfield	LA	86.63	175.3	89.0 -2.37

--- Channel 284 104.7 MHz. ---

RADD	ADD	285A	Oil City	LA	15.17	267.6	72.0 -56.83
KORI	LIC	284C3	Mansfield	LA	86.63	175.3	142.0 -55.37
KTOY	LIC-N	284A	Texarkana	AR	81.62	346.3	115.0 -33.38
KJTX	LIC	283A	Jefferson	TX	47.79	281.0	72.0 -24.21
KNCBFM	LIC-N	287A	Vivian	LA	21.96	16.8	31.0 -9.04

--- Channel 285 104.9 MHz. ---

RADD	ADD	285A	Oil City	LA	15.17	267.6	115.0 -99.83
KTOCFM	LIC-N	285C3	Jonesboro	LA	130.80	115.8	142.0 -11.20
KTOCFM	CP -Z	285C3	Jonesboro	LA	130.80	115.8	142.0 -11.20
KNCBFM	LIC-N	287A	Vivian	LA	21.96	16.8	31.0 -9.04
KORI	LIC	284C3	Mansfield	LA	86.63	175.3	89.0 -2.37
RDEL	DEL	286C	Lufkin	TX	164.95	202.7	165.0 -0.05
RDEL	DEL	286C	Lufkin	TX	164.95	202.7	165.0 -0.05
KYKS	LIC	286C	Lufkin	TX	164.95	202.7	165.0 -0.05

--- Channel 286 105.1 MHz. ---

RDEL	DEL	286C	Lufkin	TX	164.95	202.7	226.0 -61.05
KYKS	LIC	286C	Lufkin	TX	164.95	202.7	226.0 -61.05
RDEL	DEL	286C	Lufkin	TX	164.95	202.7	226.0 -61.05
RADD	ADD	285A	oil City	LA	15.17	267.6	72.0 -56.83
RADD	ADD	286C0	Lufkin	TX	164.95	202.7	215.0 -50.05
RADD	ADD	286C0	Lufkin	TX	164.95	202.7	215.0 -50.05
KNCBFM	LIC-N	287A	vivian	LA	21.96	16.8	72.0 -50.04
RADD	ADD	286A	Haynesville	LA	83.30	69.2	115.0 -31.70
DK0ZL	VAC	286A	New Boston	TX	94.46	327.9	115.0 -20.54
KRUF	LIC	233C	Shreveport	LA	8.87	154.2	29.0 -20.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3	29.0 -19.67
RDEL	DEL	289C	Longview	TX	80.96	258.4	95.0 -14.04
KYKX	LIC-N	289C	Longview	TX	80.96	258.4	95.0 -14.04
RADD	ADD	289C0	Longview	TX	80.96	258.4	86.0 -5.04

--- Channel 287 105.3 MHz. ---

KNCBFM	LIC-N	287A	Vivian	LA	21.96	16.8	115.0 -93.04
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Call	Channel	Location	Dist	Azi	FCC	Margin
KRUF	LIC	233C	Shreveport	LA	8.87	154.2 29.0 -20.13
KRUF.C	CP -N	233C	Shreveport	LA	9.33	155.3 29.0 -19.67
RADD	ADD	285A	Oil City	LA	15.17	267.6 31.0 -15.83
RDEL	DEL	289C	Longview	TX	80.96	258.4 95.0 -14.04
KYKX	LIC-N	289C	Longview	TX	80.96	258.4 95.0 -14.04
RADD	ADD	289C0	Longview	TX	80.96	258.4 86.0 -5.04
RDEL	DEL	286C	Lufkin	TX	164.95	202.7 165.0 -0.05
KYKS	LIC	286C	Lufkin	TX	164.95	202.7 165.0 -0.05
RDEL	DEL	286C	Lufkin	TX	164.95	202.7 165.0 -0.05

--- Channel 288 105.5 MHz. ---

RADDPreclude.txt

KYKX	LIC-N	289C	Longview	TX	80.96	258.4	165.0	-84.04
RDEL	DEL	289C	Longview	TX	80.96	258.4	165.0	-84.04
RADD	ADD	289C0	Longview	TX	80.96	258.4	152.0	-71.04
KNCB FM	LIC-N	287A	Vivian	LA	21.96	16.8	72.0	-50.04
RDEL	DEL	288A	Haynesville	LA	82.08	71.0	115.0	-32.92
DKWHN-	VAC	288A	Haynesville	LA	82.08	71.0	115.0	-32.92
RADD	ADD	288A	Hall Summit	LA	88.55	127.2	115.0	-26.45
RADD	ADD	285A	Oil City	LA	15.17	267.6	31.0	-15.83

--- Channel 289 105.7 MHz. ---

RDEL	DEL	289C	Longview	TX	80.96	258.4	226.0	-145.04
KYKX	LIC-N	289C	Longview	TX	80.96	258.4	226.0	-145.04
RADD	ADD	289C0	Longview	TX	80.96	258.4	215.0	-134.04
KNCB FM	LIC-N	287A	Vivian	LA	21.96	16.8	31.0	-9.04

--- Channel 290 105.9 MHz. ---

RDEL	DEL	289C	Longview	TX	80.96	258.4	165.0	-84.04
KYKX	LIC-N	289C	Longview	TX	80.96	258.4	165.0	-84.04
RADD	ADD	289C0	Longview	TX	80.96	258.4	152.0	-71.04
KNCB FM	LIC-N	287A	Vivian	LA	21.96	16.8	31.0	-9.04
RADD	ADD	290A	Pleasant Hill	LA	106.39	151.4	115.0	-8.61

--- Channel 291 106.1 MHz. ---

KXRR	LIC	291C	Monroe	LA	177.17	92.5	226.0	-48.83
KYGL	LIC-N	292C2	Texarkana	AR	62.83	2.2	106.0	-43.17
RDEL	DEL	289C	Longview	TX	80.96	258.4	95.0	-14.04
KYKX	LIC-N	289C	Longview	TX	80.96	258.4	95.0	-14.04
RADD	ADD	289C0	Longview	TX	80.96	258.4	86.0	-5.04

--- Channel 292 106.3 MHz. ---

KYGL	LIC-N	292C2	Texarkana	AR	62.83	2.2	166.0	-103.17
KOOI	LIC	293C	Jacksonville	TX	146.92	239.3	165.0	-18.08
KOOI.C	CP	293C	Jacksonville	TX	146.92	239.3	165.0	-18.08
KYKX	LIC-N	289C	Longview	TX	80.96	258.4	95.0	-14.04
RDEL	DEL	289C	Longview	TX	80.96	258.4	95.0	-14.04
RADD	ADD	289C0	Longview	TX	80.96	258.4	86.0	-5.04

--- Channel 293 106.5 MHz. ---

KOOI.C	CP	293C	Jacksonville	TX	146.92	239.3	226.0	-79.08
KOOI	LIC	293C	Jacksonville	TX	146.92	239.3	226.0	-79.08

Page # 11

Call	Channel	Location		Dist	Azi	FCC	Margin	
KYLA	LIC	294C2	Homer	LA	55.61	89.6	106.0	-50.39
KYGL	LIC-N	292C2	Texarkana	AR	62.83	2.2	106.0	-43.17

--- Channel 294 106.7 MHz. ---

KYLA	LIC	294C2	Homer	LA	55.61	89.6	166.0	-110.39
KAZE	LIC-N	295C3	Ore City	TX	60.51	265.5	89.0	-28.49
KOOI.C	CP	293C	Jacksonville	TX	146.92	239.3	165.0	-18.08
KOOI	LIC	293C	Jacksonville	TX	146.92	239.3	165.0	-18.08

--- Channel 295 106.9 MHz. ---

RADDPreclude.txt

KAZE	LIC-N	295C3	Ore City	TX	60.51	265.5	142.0	-81.49
KYLA	LIC	294C2	Homer	LA	55.61	89.6	106.0	-50.39

--- Channel 296 107.1 MHz. ---

KFYX	LIC	296A	Texarkana	AR	77.38	350.0	115.0	-37.62
KAZE	LIC-N	295C3	Ore City	TX	60.51	265.5	89.0	-28.49
KWLTV	LIC	296C3	Many	LA	136.94	156.7	142.0	-5.06
KVKIFM	LIC	243C1	Shreveport	LA	19.60	147.2	22.0	-2.40

--- Channel 297 107.3 MHz. ---

KXKZ	LIC	298C	Ruston	LA	123.06	105.3	165.0	-41.94
KISX	LIC	297C2	whitehouse	TX	125.57	246.6	166.0	-40.43
RADD	ADD	300C2	oil City	LA	27.85	50.4	55.0	-27.15
KVMAFM	CP -N	300C2	oil City	LA	33.87	144.7	55.0	-21.13
KVKIFM	LIC	243C1	Shreveport	LA	19.60	147.2	22.0	-2.40

--- Channel 298 107.5 MHz. ---

KXKZ	LIC	298C	Ruston	LA	123.06	105.3	226.0	-102.94
RADD	ADD	300C2	oil City	LA	27.85	50.4	55.0	-27.15
KVMAFM	CP -N	300C2	oil City	LA	33.87	144.7	55.0	-21.13

--- Channel 299 107.7 MHz. ---

RADD	ADD	300C2	oil City	LA	27.85	50.4	106.0	-78.15
KVMAFM	CP -N	300C2	oil City	LA	33.87	144.7	106.0	-72.13
KXKZ	LIC	298C	Ruston	LA	123.06	105.3	165.0	-41.94
RDEL	DEL	300C1	Magnolia	AR	92.89	47.9	133.0	-40.11
KVMAFM	LIC	300C1	Magnolia	AR	92.89	47.9	133.0	-40.11
KTBQ	LIC	299C2	Nacogdoches	TX	133.00	210.5	166.0	-33.00

--- Channel 300 107.9 MHz. ---

RADD	ADD	300C2	oil City	LA	27.85	50.4	166.0	-138.15
KVMAFM	CP -N	300C2	oil City	LA	33.87	144.7	166.0	-132.13
RDEL	DEL	300C1	Magnolia	AR	92.89	47.9	200.0	-107.11
KVMAFM	LIC	300C1	Magnolia	AR	92.89	47.9	200.0	-107.11

Exhibit 2



January 28, 2005

Gary Kline
Cumulus Media
P.O. Box 4555
Lafayette, Indiana 47903

Re: KVMA Alternate Sites

Dear Mr. Kline:

As you requested Aviation Systems Inc. ("ASI") has evaluated two possible alternate sites for KVMA (107.9 MHz) with respect to potential electromagnetic interference ("EMI") to regional air navigation signals. The two alternate sites are existing radio transmission towers for KMJJ at north latitude 32°36'27" west longitude 93°46'24" and KRMD at north latitude 32°41'08" west longitude 93°56'00." We will refer to the KMJJ site as Alternate 1 and the KRMD site as Alternate 2. The evaluation was done with the FAA Airspace Analysis Model ("AAM") Version 5. The radiation center was assumed to be at 150 meters HAAT and the power was assumed to be 50 kW at each alternate site. The simulation was run at the bottom of the Frequency Protected Service Volume ("FPSV") and along the localizer course radial.

Alternate 1 Evaluation

We found that four (4) localizers would be affected:

LOCALIZER	AIRPORT	FREQUENCY	LATITUDE	LONGITUDE	RUNWAY
JKC	Barksdale AFB	108.9	32°29'02"	93°39'04"	15
BAD	Barksdale AFB	109.9	32°33'14"	93°40'28"	33
SHV	Shreveport Regional	110.7	32°26'03"	93°49'02"	14
DTN	Shreveport Downtown	111.7	32°32'14"	93°44'26"	14

The AAM predicted the following EMI potential at these localizers:

LOCALIZER	A2/B2	2-SIGNAL	3-SIGNAL
JKC	2321 H Pts. 16 V Pts.	2 Combos- Worst Case 16 H Pts. 0 V Pts.	13 Combos- Worst Case 3606 H Pts. 1554 V Pts.
BAD	0	1 Combo 90 H Pts. 0 V Pts.	2 Combos- Worst Case 115 H Pts. 0 V Pts.
SHV	71 H Pts. 0 V Pts.	0	4 Combos- Worst Case 211 H Pts. 0 V Pts.
DTN	27 H Pts. 0 V Pts.	0	5 Combos Worst Case 108 H Pts. 0 V Pts.

Alternate 2 Evaluation

We found the same four (4) localizers to be affected:

LOCALIZER	A2/B2	2-SIGNAL	3-SIGNAL
JKC	529 H Pts. 10 V Pts.	0	10 Combos- Worst Case 3535 H Pts. 1554 V Pts.
BAD	0	0	26 H Pts. 0 V Pts.
SHV	165 H Pts. 0 V Pts.	0	7 Combos- Worst Case 458 H Pts. 0 V Pts.
DTN	65 H Pts. 0 V Pts.	0	5 Combos Worst Case 691 H Pts. 60 V Pts.

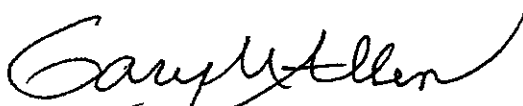
Cumulus Media
January 28, 2005
Page Three

Conclusion

Neither alternate site, under the assumed facts and simulation parameters, is feasible with respect to potential EMI at regional air navigation aids. Our computer simulation runs are being submitted separately via U.S. Mail.

Thank you for the opportunity to be of service. We look forward to assisting you again in the future.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary M. Allen".

Gary M. Allen, Ph.D., J.D.
President

Attachments

[illegible][illegible]

Exhibit 3



September 18, 2003

VIA FAX: (775) 414-3278

Mr. Gary Kline - Director of Engineering
Cumulus Media, Inc.
3534 Piedmont Road, 14th Floor
Atlanta, GA 30305

Re: 1693 Ft., 10 Ft. Face, KTBS-TV Tower Modifications for KRMD-FM
Shreveport, LA
Ref. No. 03-217

Dear Gary:

Enclosed are two (2) copies of our proposal for the referenced project as requested. After you have reviewed our proposal, we would like to discuss in detail our procedures and product with you. If acceptable, please sign and return one (1) copy along with the down payment in order for us to schedule your project.

If you have any questions or require our assistance, please contact us.

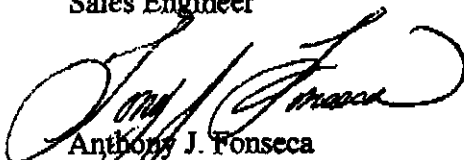
We look forward to the opportunity to work with you.

Yours very truly,

KLINE TOWERS



Ken O. Tobias
Sales Engineer



Anthony J. Fonseca
Sales Manager

KOT/AJF/tlf

Enclosure


**KLINE
TOWERS**

DIVISION OF KLINE IRON & STEEL CO., INC.

 1225-35 Huger St.
 P.O. Box 1013
 Columbia, S.C. 29202
 (803) 251-8000
 FAX: (803) 251-8099

 Curmuhus Media, Inc.
 3534 Piedmont Road, 14th Floor
 Atlanta, GA 30305

Attn: Mr. Gary Kline, Director of Engineering

REF. NO.: 03-217

Date: September 18, 2003

 REFERENCE: KRMD-FM
 Shreveport, LA
PAGE 1 of 16 PAGE (S)

WE ARE PLEASED TO SUBMIT THE FOLLOWING:

ITEM	DESCRIPTION
I.	Provide engineering, materials, fabrication, galvanizing, freight, erection, Builders Risk insurance, and inspection to modify the KTBS-TV 1693 ft 10 ft. face Kline tower as specified in the Kline Design Analysis report dated July 25, 2003, Contract No. 4315.
II.	<p><u>Load Case: One</u></p> <p>A. <u>Part One: Tower Reinforcing</u></p> <ol style="list-style-type: none"> 1. Reinforce twenty-seven (27) locations of leg panels by adding a double angle redundant brace (81 double angles total) at the mid-height of the tower bay panel. 2. Remove and replace sixteen (16) levels of round bar diagonals (96 bars total) and their connection bolts. Reaming required at two (2) locations. Note: Erection frame is required at three (3) locations. 3. Reinforce seven (7) levels of struts with a single angle member inserted between the back to back angle struts (21 angles total) and using the stitch bolt holes then drill one 1 1/16" diameter hole on each end of the double angles (drill through existing double angle and the new strut inserted in between- 3 plys). 4. Check plumb and tension of all seven (7) guy levels after all reinforcing and antenna work is complete adjust as required. <p>B. <u>Part Two: Antenna Installation</u></p> <ol style="list-style-type: none"> 1. Assemble and erect one (1) 12 Bay DCA DCR-MBR12 side mounted antenna at the 1575 ft. level. Antenna weight is 1072 lbs., antenna length 112.8 ft. (Mount by others, antenna by others.) 2. Assemble and erect one (1) 3-1/8" rigid transmission line from the base of the tower up to the antenna, item 1 above, connect to antenna and extend across the transmission line bridge to the building. (Transmission line and hangers by others, clip angles by Kline.)
III.	<p><u>Load Case: Two</u></p> <p>A. <u>Part One: Tower Reinforcing</u></p> <ol style="list-style-type: none"> 1. Reinforce sixteen (16) locations of leg panels by adding a double angle redundant brace (48 double angles total) at the mid-height of the tower bay panel. 2. Remove and replace eight (8) levels of round bar diagonals (48 bars total) and their connection bolts. Reaming required at one (1) location. Note: Erection frame is required at two (2) locations.

**BUILDERS OF THE WORLD'S TALLEST TOWERS
AISC QUALITY CERTIFICATION - CATEGORY I & II**


**KLINE
TOWERS**

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Columbia, S.C. 29202
(803) 251-8000
FAX: (803) 251-8099

DIVISION OF KLINE IRON & STEEL CO., INC.

Cumulus Media, Inc.
3534 Piedmont Road, 14th Floor
Atlanta, GA 30305

Attn: Mr. Gary Kline, Director of Engineering

REF. NO.: 03-217

Date: September 18, 2003

REFERENCE: KRMD-FM
Shreveport, LA

PAGE 2 of 16 PAGE(S)

WE ARE PLEASED TO SUBMIT THE FOLLOWING:

ITEM	DESCRIPTION
	<ol style="list-style-type: none"> Reinforce five (5) levels of struts with a single angle member inserted between the back to back angle struts (15 angles total) and using the stitch bolt holes then drill one 11/16" diameter hole on each end of the double angles (drill through existing double angle and the new strut inserted in between- 3 plys). Check plumb and tension of all seven (7) guy levels after all reinforcing and antenna work is complete adjust as required.
B.	<u>Part Two: Antenna Installation</u>
	<ol style="list-style-type: none"> Assemble and erect one (1) 12 Bay DCA DCR-MBR12 side mounted antenna at the 1575 ft. level. Antenna weight is 1072 lbs., antenna length 112.8 ft. (Antenna by others, mount by others.) Assemble and erect one (1) 3-1/8" rigid transmission line from the top of an existing 3-1/8" rigid line at the 1083 ft level up to the antenna, item 1 above, connect to antenna and extend across the transmission line bridge to the building. (Transmission line and hangers by others, clip angles by Kline.)
IV.	<u>Load Case: Three</u>
A.	<u>Part One: Tower Reinforcing</u>
	<ol style="list-style-type: none"> Reinforce sixteen (16) locations of leg panels by adding a double angle redundant brace (48 double angles total) at the mid-height of the tower bay panel. Remove and replace eleven (11) levels of round bar diagonals (66 bars total) and their connection bolts. Reaming required at two (2) locations. Note: Erection frame is required at three (3) locations. Reinforce five (5) levels of struts with a single angle member inserted between the back to back angle struts (15 angles total) and using the stitch bolt holes then drill one 11/16" diameter hole on each end of the double angles (drill through existing double angle and the new strut inserted in between- 3 plys). Check plumb and tension of all seven (7) guy levels after all reinforcing and antenna work is complete adjust as required.
B.	<u>Part Two: Antenna Installation</u>
	<ol style="list-style-type: none"> Relocate one (1) 10 Bay ERI FM side mounted antenna currently located at the 1045 ft level to 1575 ft. level. Antenna length 90 ft. (Mount by others.)

**BUILDERS OF THE WORLD'S TALLEST TOWERS
AISC QUALITY CERTIFICATION - CATEGORY I & II**


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DIVISION OF KLINE IRON & STEEL CO., INC.

 Cumulus Media, Inc.
 3534 Piedmont Road, 14th Floor
 Atlanta, GA 30305

REF. NO.: 03-217

Date: September 18, 2003

Attn: Mr. Gary Kline, Director of Engineering

 REFERENCE: KRMD-FM
 Shreveport, LA

 PAGE 3 of 16 PAGE (S)

WE ARE PLEASED TO SUBMIT THE FOLLOWING:

ITEM	DESCRIPTION
2.	Assemble and erect one (1) 3-1/8" rigid transmission line from the top of an existing 3-1/8" rigid line at the 1083 ft level up to the antenna, item 1 above, connect to antenna and extend across the transmission line bridge to the building. (Transmission line and hangers by others, clip angles by Kline.)
V.	Total Risk insurance based on the value of the tower, value of this proposal, plus the broadcasting equipment on the tower. Broadcasting equipment value estimated at \$1,000,000.
VI.	This proposal excludes any additional supporting member or modification to the existing transmission line bridge. Transmission lines are assumed to be routed on existing bridge using existing supporting structural members.
VII.	Kline Towers to provide information to the antenna and transmission line manufacturer and assist them in preparing the transmission line layout. The transmission line layout will be provided by others.
VIII.	The proposal includes plumb and tension of all guy levels, initial tensions values to be furnished by Kline.
IX.	Modifications to be made during normal daytime work hours and power to be reduced on antenna emitting radiation that would harm the workers. We will make a concerted effort to minimize the amount of time that stations will be on reduced power or off the air.
X.	Based upon an immediate order with firm release to fabricate, final antenna mechanical design information and receipt of down payment, our tentative schedule will be as follows: <ul style="list-style-type: none"> A. Tower steel will be shipped on schedule which will permit it to start arriving job site approx. 6 to 8 weeks after received order. B. Erectors will be coordinated to arrive job site with material delivery. C. Weather permitting and assuming continuous erection, it will require approx. 6 to 8 weeks to perform the tower modifications.

BUILDERS OF THE WORLD'S TALLEST TOWERS
AISC QUALITY CERTIFICATION - CATEGORY I & II



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Columbia, S.C. 29202
(803) 251-8000
FAX: (803) 251-8099

Cumulus Media, Inc.
3534 Piedmont Road, 14th Floor
Atlanta, GA 30305

Attn: Mr. Gary Kline, Director of Engineering

REF. NO.: 03-217

Date: September 18, 2003

REFERENCE: KRMD-FM
Shreveport, LA

PAGE 4 of 16 PAGE(S)

WE ARE PLEASED TO SUBMIT THE FOLLOWING:

- | ITEM | DESCRIPTION |
|------|--|
| XI. | <p>Terms Of Payment:</p> <p>A. 30% due with acceptance of order</p> <p>B. 50% due when materials are shipped and received at site.</p> <p>C. 20% due monthly progress payments.</p> |

- | | |
|------|--|
| XII. | <p>The above, excluding taxes, for the sum of:</p> <p>Load Case I</p> <p>Part I \$194,220.00</p> <p>Part II 57,885.00</p> <p>Total \$252,105.00</p> <p>Load Case II</p> <p>Part I \$124,966.00</p> <p>Part II 37,825.00</p> <p>Total \$162,791.00</p> <p>Load Case III</p> <p>Part I \$134,846.00</p> <p>Part II 33,996.00</p> <p>Total \$168,842.00</p> <p>This proposal is based on work being performed under one mobilization and is only separated into parts for accounting purposes only and is not offered for separate acceptance.</p> |
|------|--|

- | | |
|-------|---|
| XIII. | <p>If the engineer is unable to conduct his operations due to conditions imposed by Buyer, other broadcasters on the tower, or weather conditions, lost time shall be charged at the rate of \$125.00 per hour for Kline engineer and \$95.00 per hour for tower ironworker, up to 8 hours maximum per day.</p> |
|-------|---|

- | | |
|------|--|
| XIV. | <p>Price valid for 30 days from date of quotation, thereafter subject to written confirmation.</p> |
|------|--|

BUILDERS OF THE WORLD'S TALLEST TOWERS
AISC QUALITY CERTIFICATION - CATEGORY I & II

Exhibit 4

My name is Gary Kline. I am Director of Engineering for Cumulus Media Inc. Cumulus Media is the corporate parent of Cumulus Licensing, LLC, the licensee of KVMA-FM, Oil City, Louisiana.

I was personally involved in the build-out and launch of KVMA-FM on its new frequency, and in the discussions with officials at Barksdale Air Force Base regarding their reports of interference from KVMA-FM to the air navigation equipment in the B-52 aircraft stationed at Barksdale.

Prior to launching KVMA-FM on 107.9 MHz I had no previous knowledge that there would be any interference whatsoever to Barksdale Air Force Base or any of their aircraft. Moreover, I have never seen anything like this in my 23 years of working in the broadcast engineering field. There was no way to predict that the reported interference would have occurred. The problem exists inside the radio receivers on the B-52 aircraft and has to do with their age and design. The military does not share that sort of information willingly and it was only after the problem was discovered that some information was shared with me and our engineering staff.

Based on information given to me by the local military staff at Barksdale, the B-52 uses a radio receiver capable of tuning in navigational beacons which operate between 108-112 MHz. They currently use 108.9 and 109.9 MHz as their assigned frequencies for monitoring these beacons. Apparently, the radios date back to 1961 and utilize tubes for their electronics. Most aircraft outside of the military use much more modern radios with solid-state electronics. The military probably does as well. But on the B-52, things are different. I was told (off the record) that the B-52 uses an older tube-type radio intentionally to protect against electromagnetic pulse ("EMP") from a nuclear detonation. These planes were designed to enter into areas where nuclear devices might be deployed and so it is vital that they not lose communication in such an instance. Tube-type equipment is supposedly more resistant to EMP. However, the tube-type units have severe adjacent channel rejection problems. The fact that 107.9 was reported to be heard at 108.9 and 109.9 is a testament to the channel rejection issues that those older radios face.

I double checked our frequency and occupied bandwidth measurements. We were in strict compliance with FCC rules. The FCC inspector who visited us also found KVMA-FM to be legally and technically compliant.

I lowered our power (ERP) from 24,500 watts (100%) down to less than 10%. That had no effect on the aircraft radio. The radios were clearly wide-banded and super sensitive at altitude. I am told we could be heard 5 miles out. There was no way to predict this and no way to correct for it on our assigned frequency of 107.9.

I declare that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed this 15th day of February, 2005.



Gary Kline

Exhibit 5



February 15, 2005

Mark N. Lipp, Esq.
Vinson & Elkins
The Willard Office Building
1455 Pennsylvania Ave., N.W.
Washington, D.C. 20004-6500

Re: KVMA

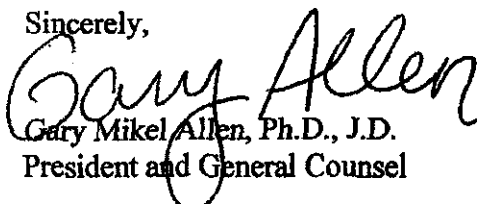
Dear Mr. Lipp:

At the request of Cumulus Media, Aviation Systems Inc. ("ASI") has evaluated the feasibility of KVMA (107.9 mHz) relocating to an alternate site within a "Usable Area Window" ("USW") (see attached figure) that would not pose electromagnetic inference ("EMI") to flight operations at Barksdale Air Force Base ("AFB") or to any regional FAA air navigational aid. To test the feasibility of meeting the goal of non-interference within the USW we selected seven sample locations dispersed throughout the area. For the purposes of this evaluation we assumed KVMA's radiation center would be at 150 meters HAAT and the power would be 50 kW. The evaluation was done via computer simulations with the FAA Airspace Analysis Model ("AAM") Version 5.

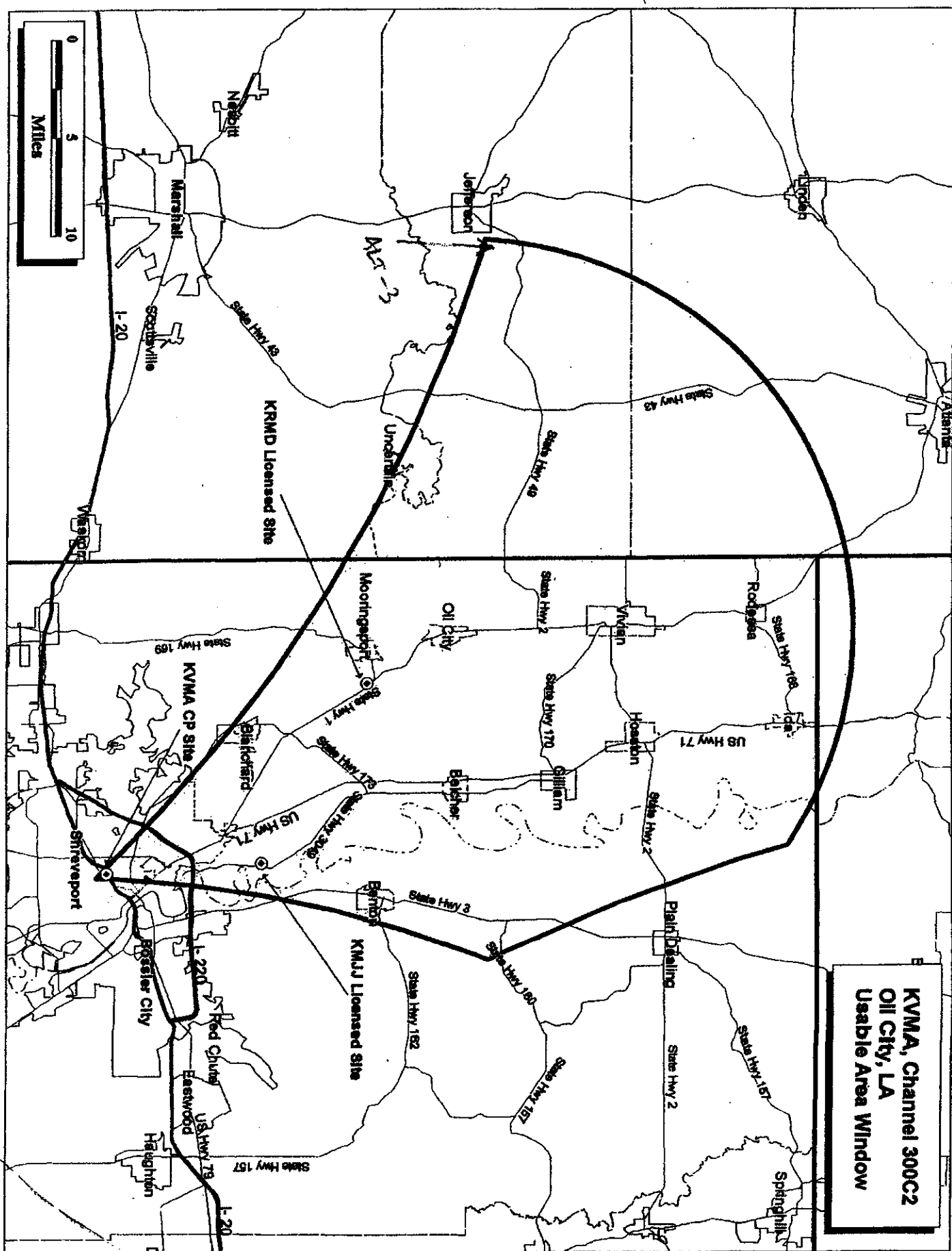
We found that there is no location within the USW that does not cause EMI in the form of intermodulation effects either of 2-signal or 3-signal combinations to one or more localizers in the region. The JKC localizer at Barksdale AFB to Runway 15 (108.9 mHz) is the navigational aid that is most severely affected although localizers at Shreveport Regional Airport and Shreveport Downtown Airport are also affected to lesser degrees. The JKC localizer is also severely affected by adjacent channel and overload interference (i.e., brute force) from any alternate location within an arc passing just northerly of Vivian which would be the approximate south east $\frac{3}{4}$ of the USW.

If you need any additional information from us in regard to this matter please do not hesitate to contact us.

Sincerely,


Gary Mikel Allen, Ph.D., J.D.
President and General Counsel


Attachment: As stated



CERTIFICATE OF SERVICE

I, Andrea Brown, a secretary in the law firm of Vinson & Elkins, LLP., do hereby certify that I have on this 28th day of February, 2005, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Opposition to Motion for Leave to File Supplement" to the following:

James L. Winston, Esq.
Rubin, Winston, Diercks, Harris & Cooke, L.L.P.
1155 Connecticut Avenue, N.W.
Sixth Floor
Washington, D.C. 20036
(Counsel to Access.1 Louisiana Holding Company LLC)


Andrea Brown